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May 20, 2021

VIA CM/ECF

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Alam, No. 1:19-cr-00280-LDH

Dear Judge Hall:

I represent Mr. Ashiquil Alam in the above-referenced case. I write to request the Court's authorization to have an associate counsel assigned. This application is necessary for my effective representation of Mr. Alam.

As the Court is aware, Mr. Alam is being prosecuted for possession of a firearm with an obliterated serial number in violation of 18 U.S.C. § 922(k), 18 U.S.C. § 924(a)(1)(B) and 18 U.S.C. § 3551. *See* ECF Nos. 1 and 8. The associate will assist in the review of discovery and 3500 material, preparation of motions *in limine* and responses thereto, and trial. The proposed associate is Mr. Norman Keith White, Esq., who is a mentee in the Eastern District's Mentoring Program. Mr. White has many years of trial experience, serving as trial counsel in other federal criminal cases, litigating civil cases in the federal court, and prosecuting matters on behalf of the Kings County District Attorney.

The Board of Judges of the Eastern District of New York has implemented a Mentoring Program, which assigns experienced members of the District's CJA Panel to act as mentors for attorneys interested in applying to the Panel. The program is intended to improve the diversity and overall quality of the CJA Panel and is open to all interested and qualified attorneys. The Program is designed to provide those attorneys with federal experience by pairing them with mentors and assigning them to cases that the District Court believes are of sufficient complexity to warrant the services of multiple attorneys. The Mentee provides the first 15 hours on a *pro bono* basis, and thereafter may bill at a rate of sixty-five dollars (\$65.00) an hour, a rate which is commensurate with the hourly rate of a court-appointed paralegal.

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If this request meets with the Court's approval, I would appreciate if Your Honor would endorse the proposed order, submitted herewith, so that I may create an eVoucher and have Mr. White begin working on the case.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman
Morris J. Fodeman

Counsel for Defendant Ashiqul Alam

cc: All Counsel of Record (via CM/ECF)